

EXHIBIT A

From: [Lauren Skala](#)
To: [John Menz](#); [John W. Moscow](#)
Cc: [Adam S. Kaufmann](#); [Mackenna White](#); [Patrick Bonner](#); [Melissa Driscoll](#); [Bakhyt Tukulov](#); [do@tkl.kz](#)
Subject: RE: [External Email] RE: In re: Application of Makhpal Karibzhanova for Judicial Assistance, S.D.N.Y. No. 1:21-MC-00442-KPF
Date: Friday, August 13, 2021 4:17:37 PM
Attachments: [Makhpal Subpoenas.zip](#)

[EXTERNAL]

Dear counsel,

Attached please find the previously-issued subpoenas.

Best regards,

Lauren Skala
Practice Support Coordinator/Investigative Analyst

Lewis Baach Kaufmann Middlemiss PLLC

The Chrysler Building
405 Lexington Avenue
64th Floor
New York, New York 10174
t 212 897 1971

[Email](#) | [Website](#)

This communication is confidential and may contain privileged information. If you have received this communication in error, please delete it and advise the sender by reply e-mail. Thank you.

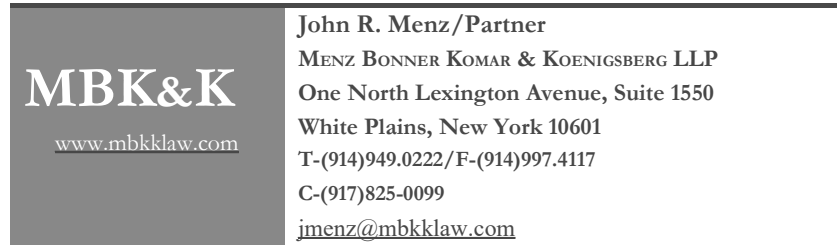
From: John Menz <JMenz@mbkklaw.com>
Sent: Friday, August 13, 2021 11:34 AM
To: John W. Moscow <John.Moscow@LBKMLAW.com>
Cc: Adam S. Kaufmann <Adam.Kaufmann@LBKMLAW.com>; Mackenna White <Mackenna.White@LBKMLAW.com>; Lauren Skala <Lauren.Skala@LBKMLAW.com>; Patrick Bonner <PBonner@mbkklaw.com>; Melissa Driscoll <MDriscoll@mbkklaw.com>; Bakhyt Tukulov <bt@tkl.kz>; do@tkl.kz
Subject: [External Email] RE: In re: Application of Makhpal Karibzhanova for Judicial Assistance, S.D.N.Y. No. 1:21-MC-00442-KPF

Dear Mr. Moscow:

We have not received any of the previously issued subpoenas promised in your August 11th correspondence. Please send them forthwith. Also, you have not responded with regard to our request that you act in good faith and not issue any further subpoenas while our application is

pending. If you intend to do so, you should serve notices and copies of to be issued subpoenas by email to Mr. Aidan Karibzhanov's lawyers in Kazakhstan, Bakhyt Tukulov at bt@tkl.kz with copy to his colleague Dinara Otegen at do@tkl.kz .

Sincerely,



From: John Menz
Sent: Wednesday, August 11, 2021 5:31 PM
To: John W. Moscow <John.Moscow@LBKMLAW.com>
Cc: Adam S. Kaufmann <Adam.Kaufmann@LBKMLAW.com>; Mackenna White <Mackenna.White@LBKMLAW.com>; Lauren Skala <Lauren.Skala@LBKMLAW.com>; Patrick Bonner <PBonner@mbkklaw.com>; Melissa Driscoll <MDriscoll@mbkklaw.com>
Subject: RE: In re: Application of Makhpal Karibzhanova for Judicial Assistance, S.D.N.Y. No. 1:21-MC-00442-KPF

Dear Mr. Moscow:


I am writing in response to your letter of today's date. I understand that you are in the process of "gathering" subpoenas that were issued without notice to Mr. Aidan Karibzhanov and request an appropriate email address for the delivery of such subpoenas. The Federal Rules of Civil Procedure require the service of a notice and copy of the subpoena on Mr. Karibzhanov before it is served on the person to whom it was directed. It is our position that your client's failure to comply with the law cannot now be corrected by the late delivery to our firm of copies of subpoenas that were illegally issued without notice. The better course is for you to advise each of the recipients of the illegally issued subpoenas that the subpoenas were illegally issued and have no force or effect. In order to have a complete record of the illegally issued subpoenas, please send them by email to me at jmenz@mbkklaw.com with copies to pbonner@mbkklaw.com and mdriscoll@mbkklaw.com . All three addresses are in the above email which is addressed to you and the other members of your firm that were copied on the email transmittal of your correspondence.

I have to believe that the process of "gathering" the subpoenas is an administrative process that can be accomplished in, at most, a few hours and that you will be able to deliver the subpoenas to us by email today. If that is not the case, then please send all of the subpoenas you have gathered to date and send them to us immediately and then follow-up with subsequent emails as you "gather" additional subpoenas. We would expect that at the end of that process you will confirm

that you have provided us with all of the illegally issued subpoenas.

With respect to subpoenas that you have not yet issued, we believe that in good faith, you should withhold service of those subpoenas to the persons to whom they are directed until the Court rules on our pending application.

Thank you in advance for your compliance.

 www.mbkklaw.com	John R. Menz/Partner MENZ BONNER KOMAR & KOENIGSBERG LLP One North Lexington Avenue, Suite 1550 White Plains, New York 10601 T-(914)949.0222/F-(914)997.4117 C-(917)825-0099 jmenz@mbkklaw.com
---	---

From: Lauren Skala <Lauren.Skala@LBKMLAW.com>

Sent: Wednesday, August 11, 2021 3:43 PM

To: Patrick Bonner <PBonner@mbkklaw.com>; John Menz <JMenz@mbkklaw.com>

Cc: John W. Moscow <John.Moscow@LBKMLAW.com>; Adam S. Kaufmann <Adam.Kaufmann@LBKMLAW.com>; Mackenna White <Mackenna.White@LBKMLAW.com>

Subject: In re: Application of Makhpal Karibzhanova for Judicial Assistance, S.D.N.Y. No. 1:21-MC-00442-KPF

[EXTERNAL]

Dear Messrs. Bonner and Menz:

Please see the attached correspondence.

Best regards,

Lauren Skala
Practice Support Coordinator/Investigative Analyst

Lewis Baach Kaufmann Middlemiss PLLC

The Chrysler Building
405 Lexington Avenue
64th Floor
New York, New York 10174
t 212 897 1971

[Email](#) | [Website](#)

This communication is confidential and may contain privileged information. If you have received this communication in error, please delete it and advise the sender by reply e-mail. Thank you.

Please note that the personnel of Lewis Baach Kaufmann Middlemiss are working remotely at this time due to the COVID-19 outbreak. Our personnel have secure remote access to our systems and software to perform essential functions so that we can continue to be responsive to clients and minimize any disruptions. You may continue to contact any of us through normal channels – telephone or email.



John W. Moscow
212 822 0164
john.moscow@lbkmlaw.com

August 11, 2021

VIA FIRST CLASS MAIL AND EMAIL

Patrick D. Bonner, Jr. (pbonner@mbkklaw.com)
John R. Menz (jmenz@mbkklaw.com)
Menz Bonner Komar & Koenigsberg LLP
One North Lexington Avenue
Suite 1550
White Plains, New York 10601

Re: *In Re Application of Makhpal Karibzhanova for Judicial Assistance Pursuant to 28 U.S.C. § 1782, S.D.N.Y. No. 1:21-MC-00442-KPF*

Dear Messrs. Bonner and Menz:

We are gathering the subpoenas which we have served and those which we are in the process of serving.

We can email them to you, when we have gathered them, if that is agreeable to you.

Please let us know by return email which includes a satisfactory address for you.

Thank you for your courtesy.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Moscow".

John W. Moscow